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November 27, 2019

VIA ECF

Honorable Denise L. Cote
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

*Re: Securities and Exchange Commission v. International Investment Group LLC
(S.D.N.Y. 19-cv-10796 (DLC))*

Dear Judge Cote:

My law firm has been representing several former employees of defendant, International Investment Group LLC (“IIG”), for the past year during the course of the SEC’s investigation, which has led to this civil enforcement proceeding. Three have been subpoenaed during the course of the investigation to provide documents and investigative testimony. The most recent testified privately this past September.

We respectfully request the opportunity to file the instant application under seal, for the reasons set forth herein, in accordance with your rules. The portions of the application for which we would seek to redact are matters of confidentiality to protect the privacy of those whom participated in the SEC’s non-public investigation, and those whom at this point should have a presumption of innocence.

Yesterday, Your Honor signed a partial preliminary injunction against IIG which contained a freeze in Part V of the Judgment and Preliminary Asset Freeze (“Judgment”) on the defendant’s assets pending a final disposition of the action. Exceptions from the freeze were made for any amounts advanced by IIG’s insurers to pay legal expenses, “upon application of Defendant or application of any party claiming right to coverage under Defendant’s insurance (which applications the Commission retains the right to oppose)....”

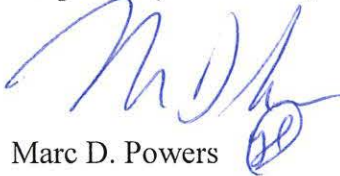
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Until issuance of the Judgment, the insurance carrier has been providing indemnification to our clients with respect to the SEC's investigation, subject to a reservation of rights. At this point in time, there are invoices outstanding for monies owed my law firm for services rendered for two of them. For the reasons set forth in more detail in the proposed Declaration to be filed under seal, it is respectfully requested that this Court issue the proposed annexed Orders, granting the sealing of this application and excepting the legal services of my law firm from the IIG asset freeze in Part V of the Judgment.

Please contact the undersigned on my cell phone today if there are any questions or concerns at (646) 387-4446. We appreciate your Honor's prompt attention to the foregoing.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "MDP", with a circular stamp or mark below it.

Marc D. Powers

cc: Philip A. Fortino, Esq. (via email fortinop@SEC.GOV)